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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Mater Case No.: 3:07-cv-05944-SC
MDL No. 1917
Individual Case Nos.
3:11-cv-05513-SC;
3:13-cv-05264-SC

This document relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC*

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC*

*Target Corp. v. Chunghwa Pictures Tubes,
Ltd., et al., No. 3:07-cv-05514-SC*

*Target Corp. v. Technicolor SA, et al., Case
No. 3:11-cv-05514-SC*

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
et al., No. 11-cv-05502-SC*

*Sears, Roebuck and Co., et. al. v. Chunghwa
Picture Tubes, Ltd., et al., No. 11-cv-5514*

**DECLARATION OF LAURA NELSON
IN SUPPORT OF PLAINTIFFS'
MOTION IN LIMINE NO. 3 TO
EXCLUDE EVIDENCE OR
ARGUMENT REGARDING BEST
BUY'S PRIVATE LABEL CRT
PRODUCTS**

Judge: Hon. Samuel Conti

*Sharp Electronics Corporation, et al. v.
Hitachi, Ltd., et al., No. 13-cv-01173-SC*

*Sharp Electronics Corp., et al. v. Koninklijke
Philips Electronics N.V., et al., No. 13-cv-2776
SC*

*ViewSonic Corporation v. Chunghwa Picture
Tubes, Ltd., et al., No. 14-cv-02510*

I, LAURA NELSON, declare as follows:

1. I am an attorney with the law firm of Robins Kaplan LLP, counsel for Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., and Bestbuy.com, L.L.C. (collectively “Best Buy”) in the above-captioned action currently pending in the U.S. District Court for the Northern District of California. I submit this declaration in support of Plaintiffs’ Motion in Limine No. 3 to Exclude Evidence or Argument regarding Best Buy’s Private Label CRT Products. I have personal knowledge of the facts stated herein, and I could and would competently testify thereto if called as a witness.

2. As counsel for Best Buy, I met and conferred with Michael Hamburger and Aya Kobori of White & Case during discovery regarding certain of Toshiba’s discovery requests seeking information regarding Best Buy’s private label CRT products. I informed counsel that Best Buy was not making a claim for any private-label products and that Best Buy did not source components for its private label CRT products, rather it purchased fully-finished products and labeled them with house brands.

3. Nonetheless, Best Buy timely responded to Toshiba’s discovery requests relating to private label CRT products. Those responses are now the subject to a Toshiba Motion to Compel, currently pending before Judge Walker.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of February, 2015 in Los Angeles, California.

/s/ Laura Nelson

Laura Nelson